UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS CORPUS CHRISTI DIVISION

SANDPIPER CONDOMINIUM	§
COUNCIL OF OWNERS, INC.	§
	§
Plaintiff,	§
	§
v .	§ CIVIL ACTION NO. 2:18-CV-00414
	§
LEXINGTON INSURANCE COMPANY	§
	§
Defendants.	§
	§
	§
	§
	§

EXHIBIT D - DECLARATION UNDER 28 U.S.C. 1746

My name is William J. Chriss, and I am a counsel of record for Plaintiff in this case. Accompanying this declaration and to be e-filed therewith are true and correct copies of the following documents:

Exhibit D-1 – LEXINGTON_000002 September 11, 2017 email produced by Lexington in discovery in this case.

Exhibit D-2 – June 27, 2018 Proof of Loss I submitted to Lexington

Exhibit D-3- July 24, 2018 Letter I received from Lexington

Exhibit D-4 – Email produced by Lexington including Adjuster's calculations

Exhibit D-5 – Contingent Fee Agreement between counsel and Sandpiper in this case

Exhibit D-6 – Correspondence between me and opposing counsel concerning amounts withheld.

Exhibit D-7 – Lexington's Requests for Production of Documents to Sandpiper

Exhibit D-8 – Correspondence from opposing counsel to me concerning privilege logs and other matters with highlighting added by me.

Exhibit D-9 – Sandpiper Responses to Lexington's Requests for Production of Documents

Exhibit D-10 - Notices of non-party document production subpoenas I have been served with by Lexington's counsel in this case.

Exhibit D-11 – Lexington's Second Supplemental Response to Sandpiper's First Set of Interrogatories served July 17, 2019.

Exhibit D-12 – Correspondence from me to Lexington's counsel dated July 2, 2019.

I learned on April 10, 2018 that Sandpiper had decided to hire our firm and was requesting a contingent fee contract to review. I began working on the case on or about April 13, 2018. Since that time, I have consulted with various expert consultants, including Krismer Consulting and Hanson engineers about the case. I have also consulted with Borden Insurance about the case.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 22nd day of July, 2019.

/s/ William J. Chriss	
William J. Chriss	